

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

)	
FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-CV-11136GAO
)	
DIRECT MARKETING CONCEPTS, INC., et)	
al.,)	
)	
Defendants.)	
)	

**DEFENDANTS' MOTION FOR LEAVE TO FILE
A MEMORANDUM OF LAW IN EXCESS OF 20 PAGES**

Defendants Direct Marketing Concepts, Inc., ITV Direct, Inc. and Donald W. Barrett (“DMC Defendants”) hereby move for leave of this Court to file an Opposition to Plaintiff’s Motion for Temporary Restraining Order with Appointment of Temporary Receiver, Expedited Discovery and Preliminary Injunction which is in excess of the twenty-page limit provided in Local Rule 7.1(b)(4). The Memorandum of Law contains 24 pages. As grounds for this Motion, DMC Defendants state:

This case involves multiple claims against corporate defendants and an individual defendant. Because the Plaintiff seeks immediate extraordinary relief, a detailed presentation of the undisputed facts and analysis of the legal issues pertaining to all defendants will assist the Court in ruling on the Plaintiff's Motion.

WHEREFORE, DMC Defendants respectfully request that this Court allow it to file an Opposition to Plaintiff's Motion for Temporary Restraining Order with Appointment of Temporary Receiver, Expedited Discovery and Preliminary Injunction in excess of twenty pages.

Respectfully submitted,
DIRECT MARKETING CONCEPTS, INC.,
ITV DIRECT, INC., AND DONALD W.
BARRETT

By their attorney(s),

/s/ Peter S. Brooks

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